

Boeing Commercial Airplane Group
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December 4, 1998
R-1150-98-MAW-314

Ms. Peggy Rice
Industrial Waste Investigator
King County Dept. of Natural Resources
130 Nickerson Street, Suite 200
Seattle, WA 98109-1658



**SUBJECT: 180-DAY NOTIFICATION OF HAZARDOUS WASTE
DISCHARGE
BOEING PLANT 2 FACILITY
PERMIT NO. 7139**

Dear Ms. Rice:

This letter addresses Section S7.3 of King County Industrial Discharge Permit No. 7139, revised June 16, 1998. This section requires that Boeing notify King County when discharges of listed or characteristic RCRA hazardous waste occur, which, if otherwise disposed, would designate as hazardous waste under 40 CFR Part 261.

This is a one time notification requirement. As such, information presented only addresses the discharge of listed or characteristic RCRA hazardous waste not previously reported. Notification last occurred on August 5, 1996.

The following wastes, containing listed or characteristic RCRA hazardous waste, were discharged to the sanitary sewer:

1. On July 1, 1998, a 2,000 gallon batch discharge occurred near the former Building 2-106. This discharge, associated with dewatering for a new storm drain line, contained 1,1,1 trichloroethane (TCA) at 1.74 $\mu\text{g/l}$. TCA was used at Plant 2 in the past as a degreasing solvent, resulting in soil and groundwater contamination. Consequently, when TCA is detected in waste that has had contact with the subsurface environment, Boeing applies dangerous waste number F002, even though the concentration would not otherwise cause the waste to designate as a hazardous waste.

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2. Acetone was found in the following wastes, at the concentrations presented:

- One 20,000 gallon batch discharge; shoreline remediation, Building 2-41; July 1997; 604 µg/l
 - One 20,000 gallon batch discharge; cleaning Building 2-62 AWACS Paint Booth; May 1997; 430 µg/l
 - Three 20,000 gallon batch discharges; storm drain system cleaning from a temporary chiller spill; origin - Building 2-83 east end; November 1997; 91 µg/l to 6,540 µg/l
- from dewatering of sediment during the cleanup of*
Appendix 12

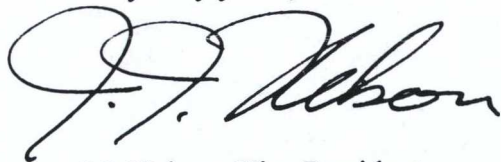
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Acetone historically has been used at Plant 2 as a cleaning solvent, resulting in soil and groundwater contamination. Consequently, when acetone is detected in waste that has had contact with the subsurface environment, Boeing takes the conservative approach and applies dangerous waste number F003, even though the concentration would not otherwise cause the waste to designate as a hazardous waste. In addition, acetone used as a cleaning solvent in Buildings 2-62, 2-83 and 2-87 is suspected of contributing to the concentrations detected.

As required by the permit, Boeing certifies that we have a program in place to reduce the volume or toxicity of hazardous wastes that we generate, to the degree that is economically practical.

Please call Mark Wicklein at (206) 655-4930 if you have any questions or require additional information about this report.

Very truly yours,



J.J. Nelson, Vice President
BCAG Facilities Asset Management
6-8AR7 M/C 2R-70
(206) 544-7400

cc: Mr. Micheal A. Bussell, Director, EPA Office of Waste and Chemicals Management
Mr. Greg Sorlie, Manager, Ecology Hazardous Waste and Toxics Reduction Program